

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINTFILED _____ ENTERED _____
LOGGED _____ RECEIVED _____

Your affiant, Special Agent Jennifer Marks of the Bureau of Alcohol Tobacco Firearms and Explosives (ATF), after being duly sworn, states as follows:

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ DEPUTY

1. I have been a Special Agent with ATF since 2009 and I am currently assigned to the ATF Baltimore Field Division, Hyattsville Group II. I attended the Department of Homeland Security's Criminal Investigator Training Program and ATF's Special Agent Basic Training, both located at the Federal Law Enforcement Training Center in Glynco, Georgia, for a combined period of twenty-six weeks. I received extensive training in the provisions of firearms and explosive laws administered under Title 18 of the United States Code. Prior to joining ATF, I received a bachelor's degree from Tufts University and a J.D. from University of Michigan. In addition, I worked for 6 years as a Special Agent with Air Force Office of Special Investigations.

2. I have conducted and participated in numerous investigations concerning the illegal possession of firearms, federal controlled substance laws, and the commission of violent crimes as an ATF agent. I have received specialized training and personally participated in various types of investigative activities, including, but not limited to: (a) firearms trafficking; (b) physical surveillance; (c) the debriefing of defendants, witnesses, informants, and other individuals who had knowledge of firearms laws; (d) the execution of search warrants; and (e) the handling and maintenance of evidence.

3. This Affidavit is submitted in support of a Criminal Complaint charging Tamufor Nchumuluh ST. MICHAEL (ST. MICHAEL) with violations of Title 18 U.S.C. § 922(a)(1)(A), that is, unlawfully engaging in the business of importing, manufacturing, or dealing in firearms without a license.

4. Because this Affidavit is offered for the limited purpose of establishing probable

cause to support the Criminal Complaint, it contains only a summary of relevant facts. I have not included each and every fact known to me concerning the entities, individuals, and the events described in this Affidavit. I have not, however, excluded any information known to me that would defeat a determination of probable cause.

5. The statements made in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided to me by other law enforcement officers; and (c) the training and experience of myself and other law enforcement agents and officers. All statements are related in substance and in part, and to the best of my knowledge are true and correct.

PROBABLE CAUSE

6. The ATF, along with other law enforcement agencies, have been conducting an investigation of ST. MICHAEL for violations of various federal offenses.

7. According to immigration records, ST. MICHAEL arrived in the U.S. on August 17, 2001, on a visitor visa. He applied for asylum on or about November 5, 2001, and became a naturalized U.S. Citizen on or about April 22, 2011. ST. MICHAEL enlisted in the U.S. Navy Reserves in 2008. ST. MICHAEL is currently a USN Reservist assigned to United Identification Code 62243, Naval Operational Support Center (NAVOPSTCEN), 1 San Diego Loop Bldg. 3282, Joint Base Andrews AFB, MD 20762.

8. The investigation to date has established that numerous firearms dealers and other vendors engaged in the sale of military type items shipped items to ST. MICHAEL at 6701 Golden Ring Road, Rosedale, MD 21237 over at least the last year.¹

¹ On or about May 17, 2017, ST. MICHAEL submitted an application to the state of Maryland to become a Designated Collector. A Designated Collector is a status granted and approved by the Maryland State Police upon submission of an application. It is granted to an individual who devotes time and attention to acquiring certain types of regulated firearms for the enhancement of the collector's personal collection or possesses a Federal

a. According to records produced by Brassbombers.com, which advertises itself on the Internet as a company that sells "once fired military brass for reloading," on July 27, 2018, the company received an order for "400 pieces of as-is 50BMG cases" from email address "tamufor87@gmail.com." Brassbombers.com shipped those items in accordance with the billing and shipping information provided for the order, which was Tamufor ST. MICHAEL, 6701 Golden Ring Road, Rosedale, MD 21237. Also included with the order was a copy of ST. MICHAEL'S Military Identification (CAC card), which allowed him to receive a price discount.

b. Sports South, LLC is a vendor located in Shreveport, LA. According to records obtained from Sports South, LLC, on or about April 3, 2019, Tamufor ST. MICHAEL, using the address of 6701 Golden Ring Rd., Rosedale, MD 21237, purchased 450 boxes of Tula .223 caliber ammunition. Each box contained 20 rounds for a total of 9000 rounds of ammunition.

c. GunBroker.com is an online auction site. Records obtained from GunBroker.com reflect that one of its on-line customers with the user name "Jason24mark" corresponded to the following billing and shipping information: Buyer ID: 4454483, Bill to Name: Tamufor ST. MICHAEL, Bill to Address: 6701 Golden Ring Road, Rosedale, MD 21237.

d. GunBroker.com's records also reflect that "Jason24mark" placed approximately 131 orders between March 2018 and March 2019, all of which were shipped to the 6701 Golden Ring Road address.

9. Based upon this and other information, on July 12, 2019, the Honorable Beth P. Gesner, United States Magistrate Judge for the District of Maryland, authorized a search and

Firearms License (Collector of Curio and Relics). A Designated Collector is not authorized to act as a firearms dealer. ST. MICHAEL's application was approved on or about May 23, 2017. ST. MICHAEL does not currently possess a Federal Firearm License.

seizure warrant for 6701 Golden Ring Rd., Rosedale, MD 21237.

10. On July 19, 2019, the ATF, and other law enforcement agencies, executed the search warrant at the Golden Ring address. During the execution of the warrant, law enforcement recovered, among other things

- a. six rifles (including a .50 cal);
- b. five handguns;
- c. one silencer;
- d. thousands of rounds of pistol (9mm, 45 ACP) ammunition;
- e. approximately 6,000 rounds of rifle (.50, .300, .308, .223 cal and 7.62mm) ammunition;
- f. several thousand pieces of ammunition components (brass, bullets, primers);
- g. documents for the manufacturing of ammunition; explosives and improvised explosive devices (IEDs);
- h. ammunition reloading equipment;
- i. ten AR-style and 3 large-caliber lowers made from unfinished lower receivers;
- j. six unfinished AR-style lower receivers;
- k. a Computer Numerical Control (CNC) router to mill lower receivers;
- l. hydraulic press used to fold unfinished AK "flats";
- m. electronic devices;
- n. shipping records for numerous purchases of firearms ammunition, parts and accessories.


11. ST. MICHAEL lists 6701 Golden Ring Road as his address with the Maryland Vehicle Administration. Property records for the State of Maryland list ST. MICHAEL as the owner of the address. In addition, citizens from the area, who witnessed the execution of the search

warrant on July 19, 2019, identified ST. MICHAEL as the occupant of the address.

12. Based upon my training, knowledge and experience, I believe that the number of firearms, parts, and accessories, coupled with the manufacturing equipment and several firearms in various states of assembly located within the residence, indicate that ST. MICHAEL is engaged in the unlawful manufacturing of firearms without a license.

CONCLUSION

13. Based on the foregoing facts, I believe probable cause exists to support the issuance of a Criminal Complaint charging ST. MICHAEL with violations of Title 18 U.S.C. § 922(a)(1)(A), the unlawfully engaging in the business of importing, manufacturing, or dealing in firearms without a license.



Special Agent Jennifer Marks,
Bureau of Alcohol Tobacco Firearms
and Explosives

Subscribed and sworn to before me this 19th of July, 2019.



A. David Copperthite
United States Magistrate Judge